

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

INTELLECTUAL VENTURES I LLC and)	
INTELLECTUAL VENTURES II LLC,)	
)	
<i>Plaintiffs,</i>)	C.A. No. 4:24-cv-00980-ALM
)	
v.)	
)	JURY TRIAL DEMANDED
AMERICAN AIRLINES, INC.)	
)	
<i>Defendant.</i>)	

PLAINTIFFS’ OPPOSED MOTION TO FILE UNDER SEAL
PLAINTIFFS’ MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Pursuant to Eastern District of Texas Local Rule 5(a)(7)(C), Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (“Plaintiffs” or “IV”) move to file under seal Plaintiffs’ Opposed Motion for Leave to File Amended Complaint (“IV’s Motion”).

There is good cause for this document to be filed under seal. There is not currently a Protective Order entered in this matter and IV’s Exhibit to the Motion cites to and quotes language from licensing agreements that are confidential and attorney’s eyes only. Accordingly, to preserve the confidentiality of that information, IV requests that IV’s Motion and Exhibits filed thereunder be filed under seal.

Dated: May 23, 2025

Respectfully submitted,

By: /s/ Jonathan K. Waldrop

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Attorneys for Plaintiffs

INTELLECTUAL VENTURES I LLC and

INTELLECTUAL VENTURES II LLC

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Plaintiffs attempted to meet and confer with counsel for Defendant on Wednesday, May 21, 2025 regarding the IV's Motion for Leave to File Amended Complaint. Plaintiffs' counsel attempted a follow-up email the same day.

On Thursday, May 22, 2025, Defendant's counsel requested a draft of the proposed amended complaint, along with a redline version, for American's consideration. Later that day, Plaintiffs' counsel attempted to reach Defendant's counsel by telephone and followed up with an email.

On Friday, May 23, 2025, Defendant's counsel responded, stating that he would "discuss IV's request with our client and let you know if American agrees." Plaintiffs' counsel did not receive the requested agreement and, accordingly, proceeded to file the Motion for Leave to File Amended Complaint, understanding that the motion and request to file under seal is currently opposed.

Should the parties reach an agreement or non-opposition, counsel for Plaintiffs will promptly advise the Court. *See* Exhibit A (Email Correspondences).

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument was served or delivered electronically via email to all counsel of record on this 23rd day of May, 2025.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop